

## PIERRE PIERRE LAW, P.C.

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NEW YORK OFFICE:

211 East 43rd Street  
Suite 608  
New York, NY 10017  
Phone: (646) 992-8383  
Fax: (718) 504-6962

*\*\*\*mail all correspondence*

FLORIDA OFFICE:

1451 W Cypress Creek Road  
Suite 300  
Ft. Lauderdale, FL 33309  
Phone: (954) 884-5040  
Fax: (754) 484-3121

December 17, 2021

Honorable Debra C. Freeman  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Courtroom 17A  
New York, NY 10007

**Letter Motion:  
SECOND Extension of Time  
Request**

**Re: Rosa O Ellis v. Comm'r of SSA 1:20-cv-09627-VEC-DCF**

Dear Honorable Judge Freeman:

Pursuant to the Revised Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on December 20, 2021.

Plaintiff writes to respectfully request the Court's indulgence with a second request for an extension of time to serve his motion. Plaintiff expected to complete his brief herein in compliance with the revised scheduling order but was unable to do so due to staffing issues and multiple motions coming due on or about the same date. Plaintiff therefore writes to respectfully request a second extension of time of sixty days (60), with the following proposed revised Scheduling Order:

- a) Plaintiff to serve her motion on or before February 18, 2022;
- b) Defendant to serve his cross motion on or before April 19, 2022;
- c) Plaintiff to serve her Reply, if any, on or before May 10, 2022.

Defendant has given consent to this request for a second extension. Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre

Eddy Pierre Pierre, Esq.

Attorney for Plaintiff

(646) 992-8383

(718) 504-6962 fax

Cc: Susan D. Baird, Esq. (Via ECF)

Attorney for Defendant.

Although the Court acknowledges that it did not rule on this request, it also notes that Plaintiff did not, as proposed, file a motion by 2/15/2022, nor has Plaintiff taken any further steps to pursue the matter since then, even though more than a month has now passed since that date. Under the circumstances, the Court expects that Plaintiff's motion for judgment on the pleadings will be filed no later than 4/21/2022. Defendant's opposition and cross-motion shall be filed no later than 6/20/2022. Plaintiff's reply, if any, shall be filed no later than 7/11/2022.

SO ORDERED



DEBRA FREEMAN

United States Magistrate Judge

Dated: 3/22/2022